

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

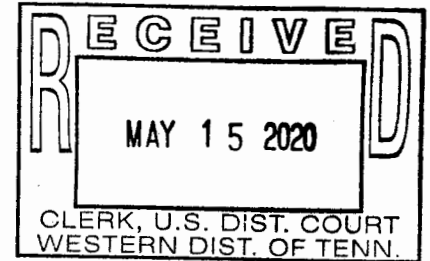
Hans Allen Banks
inmate # 19113382

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

Shelby County Sheriffs office
Shelby County Detention Center/Jail

(Enter above the full name of the defendant
or defendants in this action.)



COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No ()
- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: none

Defendants: none

2. Court (if federal court, name the district; if state court, name the county):

none

3. Docket Number: N/A

4. Name of judge to whom case was assigned: N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

- II. Place of Present Confinement: Shelby County Jail
- A. Is there a prisoner grievance procedure in the institution? Yes (☒) No (☐)
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes (☒) No (☐)
- C. If your answer is Yes:
1. What steps did you take? wrote grievance, appeals, and letters up the chain of command
 2. What was the result? Ignored and my pleas unanswered and violations covered up
- D. If your answer is No, explain why not: N/A
N/A

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

- A. Name of Plaintiff Hans Allen Banks
Address 201 Poplar Ave 4-P-12 Memphis TN 38103

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

- B. Defendant Sheriff Floyd Bonner JR is employed as Shelby County Sheriff
at 201 Poplar Ave Memphis TN 38103 Shelby County Jail

- C. Additional Defendants: Ofc. Bowman SFWilliams #17831 Bunting S-6486
Drown Taylor #10988 Sgt Reed #4243 Sgt Jeffreys #6126
Lt Masters Lt Anderson Lt Green #5-4613 Lt Hunt S-6090
Sgt Wilks #5-6028 Ofc. Davis #21815

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

10/8/19 Ofc. Bowman violated sexual harassment standard of PREA. 10/10/19
SFWilliams #17831 and Sgt Bunting #S-6486 "erroniously" found me guilty
of filling a false statement and was sentenced to 45 days in deadlock
where I faced more severe sexual harassment, physical attack and
several human rights violations of extended days and two occasions a
week without shower or recreation. I appealed to disciplinary board
Seargents Luitenants the chief of Jail and the sheriff to no avail.
upon leaving the dead lock confinement 3 PREA investigations
12/7/19, 12/13/19 and 4/17/20 determined to be false resulted
in not one of the three sent to dead lock confinement

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

I would like to be financially compensated for my pain and suffering, distress, harsh treatment, anxiety and frustration and changes enacted in jail policy and sensitivity training for all jail staff to ensure fair and equal treatment and protection of LGBTQ inmates

VI. Jury Demand

I would like to have my case tried by a jury. Yes ☒ No ☐.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 12 day of May ~~March~~, 20 20.

Hans Allen Banks
Inmate #1913382
Hans Banks
(Signature of Plaintiff/Plaintiffs)

- 10/8/19 Officer Bowman made sexual harassment statements about my homosexuality talking about me sucking dick and hinting to other inmates that my medication is for HIV
- 10/10/19 SF Williams #17831 conducts investigation and Sgt Bunting #S-6484 signs off on cover-up ignoring the statements given by my witnesses and sends me to disciplinary for making a fake statement punishable by 45 days in deadlock
- 10/17/19 Brown-Taylor #10988 Jones #18751 and Gamble #10902 conduct disciplinary board and I furnish 2 different witnesses written and signed statements all verifying my innocence and truthfulness of my claim and yet still found guilty
- 10/21/19 I appeal the disciplinary board decision
- 10/30/19 I receive response to appeal from Sgt Reed #S-4243 denying my appeal and official response from Lt. Masters dismissing any claims made because I wrote Chief Fields
- 10/22/19 I enter deadlock 10/22 and keep record of dates and times length that I'm let out of my cell the list of dates show gaps of time 3, 5, 7, and even 9 days of consecutive confinement without exercise or shower 10/25 11/1 11/3 11/5 11/7 11/12 11/17 11/20 11/22 11/23 11/26 12/4 12/6

10/31/19 I notify Sgt Jeffreys #6126 about inmate in
4 cell hitting me in the face with a rock
she tells me she will notate it in the log book
I hand the rock to guard making rounds

11/6/19 I write Lt Anderson

11/14/19 Inhouse mail response from Sgt Reed #5-4243

12/6/19 File grievance about the extended dates with
no recreation or showers which is found grievable
Time in deadlock over and relocated to 3-N-E

12/7/19 Inmate A. Williams #19117082 files false PREA
due to his gang affiliation report done by officer
Moore #15011 and signed off by Sgt Bunting #5648
+ #10522 inmate Williams removed to another
dorm

12/13/19 Inmate J. Herson files false PREA with officer
Davis #21815 and signed off by supervisor Sgt
Jeffreys #6126